## MASSENA LAW P.C.

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 ADMITTED IN FEDERAL AND NEW YORK STATE COURTS

## September 7, 2023

## **BY ECF**

Honorable Lorna G. Schofield United States District Judge Southern District of New York Thurgood Marshall Courthouse 40 Foley Square, New York, NY 10007 Application Granted. Defendant's sentencing hearing is adjourned from October 10, 2023, to **January 22, 2024, at 10:30 a.m**. Defendant's sentencing submission shall be filed by **January 3, 2024**. The Government's sentencing submission shall be filed by **January 8, 2024**. The Clerk of the Court is directed to terminate the motion at docket number 23.

Dated: September 8, 2023 New York, New York

LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Re: United States v. Richard Marrero, 23 CR 00278 (LGS)

Dear Judge Schofield,

I represent the defendant Richard Marrero, regarding the above-referenced matter. This matter is scheduled for sentencing October 10, 2023, at 10:30am. On behalf of the defendant, I write to respectfully request that Mr. Marrero's sentencing be adjourned for a period of 90 days. Counsel requires additional time to secure documents relevant to Mr. Wright's sentencing and to review its sentencing submission with the defendant.

Mr. Marrero suffered strokes in February 2023 and in May of 2023. The May 2023 stroke occurred while in the custody of the Bureau of Prisons at the Metropolitan Detention Center. Mr. Marrero is currently detained at the Winsor Park Rehab and Nursing Center in Queens New York. As a result of his recent strokes Mr. Marrero currently uses a wheelchair, suffers from temporary loss of movement on one side of his body and his ability to speak is compromised.

I respectfully request that Mr. Marrero's scheduled sentencing date be adjourned for a period of 90 days from October 10, 2023, to January 10, 2024. Counsel is actively acquiring medical records and other materials that it believes would be helpful to this Court in determining an appropriate sentence. A 90-day adjournment should provide counsel sufficient time to gather all outstanding relevant materials and prepare Mr. Marrero for sentencing considering his current medical condition. The Government consents only to a 30 adjournment.

Thank you for your consideration in this matter.

Respectfully submitted.

Alain V. Massena

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